

## REMARKS

This is intended as a full and complete response to the Office Action dated July 9, 2002, having a shortened statutory period for response set to expire on October 9, 2002. Please reconsider the claims pending in the application for reasons discussed below.

Claims 1-8, 11-13, and 17-20 have been amended. New claim 21 has been added. Applicants submit that the amendments and new claim do not introduce new matter.

A set of drawing illustrating Figure 29 is enclosed. The drawing is simply an enlarged view of a rigidifying plate, which is also illustrated in Figure 27. Applicants respectfully request that the drawing be entered without prejudice. Therefore, no new matter has been introduced.

Claims 1-7 and 17-19 stand rejected under 35 U.S.C. § 102(b) as being anticipated by *Hussman* (U.S. Patent No. 2,064,751). The Examiner takes the position that *Hussmann* proposes a lower mainframe, an upper mainframe including a rigidifying plate with an aperture, a main base late with a plurality of recesses, a dampener system including a plurality of axially extending support members, and a fastener structure.

In fact, *Hussmann* is directed to an anti-vibration base for supporting moving machinery and the like. A machine platform is disposed above the base. The platform has openings intermediate its edges and flanges formed adjacent the openings to provide greater rigidity to the platform. A plurality of springs is disposed between the base and the platform. However, *Hussmann* does not teach or disclose a platform to support one or more semiconductor substrate processing cells comprising an upper mainframe that includes a plurality of recesses, wherein each recess is configured to receive a semiconductor substrate processing cell. Rather, *Hussmann* proposes an anti-vibration base for supporting moving machinery. Accordingly, claims 1 and 17, as amended, should be allowable over *Hussmann*. Claims 2-7 and 18-19 should also be allowable since they respectively depend from claims 1 and 17.

The Examiner has deemed claims 11-16 allowable. Applicants appreciate the Examiner's indication of their allowance. Claims 11-13 have been amended to more

clearly recite the aspects of the invention recited in those claims. Applicants respectfully submit that claims 11-13 should remain in condition for allowance.

Claims 8-10 and 20 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Claims 8-10 and 20 should now be in condition for allowance since they respectively depend from claims 1 and 17, which should be in condition for allowance.

In conclusion, the references cited by the Examiner, neither alone nor in combination, teach, show, or suggest the method or process of the present invention. Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

The prior art made of record is noted. However, it is believed that the secondary references are no more pertinent to the Applicants' disclosure than the primary references cited in the office action. Therefore, it is believed that a detailed discussion of the secondary references is not deemed necessary for a full and complete response to this office action. Accordingly, allowance of the claims is respectfully requested.

Respectfully submitted,



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## APPENDIX

1. (Amended) A platform to support [a] one or more semiconductor processing cells, comprising:
  - a lower mainframe;
  - an upper mainframe including a plurality of recesses, each one of the plurality of recesses configured to receive a semiconductor substrate processing cell; and
  - a dampener system disposed between the lower mainframe [to] and the upper mainframe.
2. (Amended) The platform of claim 1, wherein the upper mainframe further comprises a fastener structure positioned proximate each one of the recesses, wherein [the cell is affixed to] the fastener structure is configured to hold the semiconductor substrate processing cell.
3. (Amended) The platform of claim 1, wherein the upper mainframe further comprises a rigidifying plate and a main base plate[, the main base plate] comprising the plurality of recesses, the rigidifying plate comprising at least one aperture[, the rigidifying plate] and attached to the main base plate [so] such that the at least one aperture is aligned with the recesses.
4. (Amended) The platform of claim 1, wherein the semiconductor substrate processing cell is a process cell.
5. (Amended) The platform of claim 1, wherein the semiconductor substrate processing cell is a metrology cell.
6. (Amended) The platform of claim 1, wherein the semiconductor substrate processing cell is an SRD cell.

7. (Amended) The platform of claim 1, wherein the dampener system comprises a plurality of [axially extending] support members that extend between the lower mainframe and the upper mainframe.

8. (Amended) The platform of claim 7, wherein each [axially extending] support member comprises:

a hollow tubular member;

a piston slidably disposed within the hollow tubular member; and

a dampening element contained within the hollow tubular member, wherein the piston is biased against the dampening element.

11. (Amended) A platform to support a cell, comprising:

a lower mainframe;

an upper mainframe including a plurality of recesses, each one of the plurality of recesses configured to receive a cell; and

a dampener system connecting the lower mainframe to the upper mainframe[.], wherein the dampener system comprises a plurality of [axially extending] support members that extend between the lower mainframe and the upper mainframe, each [axially extending] support member comprises:

a hollow tubular member,

a piston slidably disposed within the hollow tubular member, and

a dampening element contained within the hollow tubular member,

wherein the piston is biased against the dampening element.

12. (Amended) The platform of claim 11, wherein the upper mainframe further comprises a fastener structure positioned proximate each one of the recesses, wherein [the cell is affixed to] the fastener structure is configured to hold the cell.

13. (Amended) The platform of claim 11, wherein the upper mainframe further comprises a rigidifying plate and a main base plate[, the main base plate] comprising the plurality of recesses, the rigidifying plate comprising at least one aperture[, the

rigidifying plate] and attached to the main base plate [so] such that the at least one aperture is aligned with the recesses.

17. (Amended) A platform to support [a] one or more semiconductor substrate processing cells, comprising:

a lower mainframe;  
an upper mainframe including a plurality of recesses, each one of the plurality of recesses configured to receive a semiconductor substrate processing cell; and  
a dampener means disposed between the lower mainframe to the upper mainframe to support the upper mainframe relative to the lower mainframe.

18. (Amended) The platform of claim 17, wherein the upper mainframe further comprises a fastener [structure] means positioned proximate each one of the recesses, wherein [the cell is affixed to] the fastener [structure] means is configured to hold the semiconductor substrate processing cell.

19. (Amended) The platform of claim 17, wherein the upper mainframe further comprises a rigidifying plate and a main base plate[, the main base plate] comprising the plurality of recesses, the rigidifying plate comprising at least one aperture[, the rigidifying plate] and attached to the main base plate [so] such that the at least one aperture is aligned with the recesses.

20. (Amended) The platform of claim 17, wherein the dampener means comprises a dampening element, the dampening element [is] being sand.